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Plaintiffs' Liaison Counsel

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 IN RE: SOCIAL MEDIA ADOLESCENT
 13 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
 MDL No. 3047

14 This Document Relates to:

15 *R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083;
 16 *K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-
 17 04086;
 18 *K.K. and K.A. v. Meta Platforms, Inc. et al.*,
 19 4:24-cv-04425;
 20 *K.K. and C.K. v. Meta Platforms, Inc. et al.*,
 21 4:24-cv-04426;
 22 *C.S., filed on behalf of minor T.P. v. Meta*
 23 *Platforms, Inc. et al.*, 4:24-cv-04495;
 24 *M.M., filed on behalf of minor A.B. v. Meta*
 25 *Platforms, Inc. et al.*, 4:24-cv-04578;
 26 *K.N., filed on behalf of minor A.N. v. Meta*
 27 *Platforms, Inc. et al.*, 4:24-cv-05161;
 28 *S.C., filed on behalf of minor D.G. v. Meta*
Platforms, Inc. et al., 4:24-cv-05178;
C.C., filed on behalf of minor L.C. v. Meta
Platforms, Inc. et al., 4:24-cv-05369;

**DECLARATION OF JENNIE LEE
 ANDERSON IN SUPPORT OF
 PLAINTIFFS' ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 EXHIBITS TO THE DECLARATION OF
 JENNIE LEE ANDERSON IN SUPPORT OF
 PLAINTIFFS' ELEVENTH
 CONSOLIDATED *EX PARTE*
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS *AD LITEM***

1 *C.D., on behalf of C.F. v. Meta Platforms,*
 2 *Inc. et al., 4:24-cv-06506;*
 3 *J.H., filed on behalf of minor M.H. v. Meta*
 4 *Platforms, Inc., et al., 4:24-cv-06613;*
 5 *B.B, filed on behalf of minor O.B. v. Meta*
 6 *Platforms, Inc., 4:24-cv-06139;*
 7 *L.J. and B.J. v. Meta Platforms, Inc. et al.,*
 8 *4:24-cv-06722;*
 9 *J.G., individually and on behalf of Z.J. v.*
 10 *Meta Platforms, Inc. et al., 4:24-cv-06723;*
 11 *B.D., on behalf of Z.H. v. Meta Platforms,*
 12 *Inc. et al., 4:24-cv-06727;*
 13 *D.C., on behalf of T.S. v. Meta Platforms, Inc.*
 14 *et al., 4:24-cv-06728;*
 15 *D.C. and E.B v. Snap Inc. et al., 4:24-cv-*
 16 *06729;*
 17 *R.Z., filed on behalf of minor C.Z. v. Meta*
 18 *Platforms, Inc. et al., 4:24-cv-06641.*

15 I, Jennie Lee Anderson, do hereby declare and state as follows:
 16

17 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
 18 to practice before the courts of the State of California and in the Northern District of California. I
 19 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
 20 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of
 21 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
 22 make this declaration of my own personal knowledge and, if called as a witness, I could and
 23 would testify competently to the matters stated below.

24 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
 25 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Eleventh
 26 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative
 27 Motion to Seal").

28 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on

1 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
 2 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
 3 Plaintiffs' Eleventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 4 ("Anderson Declaration").

5 4. True and correct copies of the following Exhibits to the Anderson Declaration
 6 are as follows and attached hereto:

- 7 • *R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083 (Exhibit 1)
- 8 • *K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-04086 (Exhibit 2);
- 9 • *K.K. and K.A. v. Meta Platforms, Inc. et al.*, 4:24-cv-04425 (Exhibit 3);
- 10 • *K.K. and C.K. v. Meta Platforms, Inc. et al.*, 4:24-cv-04426 (Exhibit 4);
- 11 • *C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495
 12 (Exhibit 5);
- 13 • *M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578
 14 (Exhibit 6);
- 15 • *K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161
 16 (Exhibit 7);
- 17 • *S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178
 18 (Exhibit 8);
- 19 • *C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369
 20 (Exhibit 9);
- 21 • *C.D., on behalf of C.F. v. Meta Platforms, Inc. et al.*, 4:24-cv-06506 (Exhibit 10);
- 22 • *J.H., filed on behalf of minor M.H. v. Meta Platforms, Inc., et al.*, 4:24-cv-06613
 23 (Exhibit 11);
- 24 • *B.B., filed on behalf of minor O.B. v. Meta Platforms, Inc.*, 4:24-cv-06139 (Exhibit 12);
- 25 • *L.J. and B.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06722 (Exhibit 13);
- 26 • *J.G., individually and on behalf of Z.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06723
 27 (Exhibit 14);
- 28 • *B.D., on behalf of Z.H. v. Meta Platforms, Inc. et al.*, 4:24-cv-06727 (Exhibit 15);

- 1 • *D.C., on behalf of T.S. v. Meta Platforms, Inc. et al.*, 4:24-cv-06728 (Exhibit 16);
- 2 • *D.C. and E.B v. Snap Inc. et al.*, 4:24-cv-06729 (Exhibit 17);
- 3 • *R.Z., filed on behalf of minor C.Z. v. Meta Platforms, Inc. et al.*, 4:24-cv-06641
- 4 (Exhibit 18).

5 Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a
6 standing stipulation that the individual applications seeking appointment of guardians *ad litem* in
7 this litigation may be filed under seal. Defendants also confirmed that, in so stipulating,
8 Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future
9 to unseal individual applications and/or require parents who wish to proceed pseudonymously
10 going forward make a showing of good cause.

11 I declare under penalty of perjury pursuant to the laws of the United States of America that
12 the foregoing is true and correct.

13 Dated: October 25, 2024

14 Respectfully submitted,

15 /s/Jennie Lee Anderson
16 Jennie Lee Anderson

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